

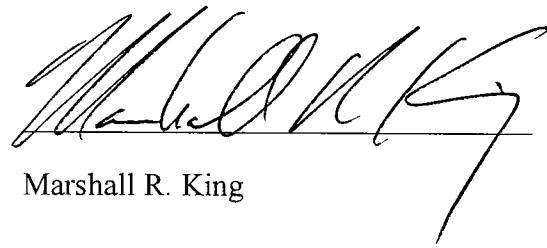
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE BANK OF NEW YORK, as Indenture : 07 Civ. 4659 (SAS)
Trustee, :
Plaintiff, : ECF Case
v. :
TYCO INTERNATIONAL GROUP S.A. and :
TYCO INTERNATIONAL LTD., :
Defendants. :
----- x -----
**DECLARATION OF
MARSHALL R. KING IN
CONNECTION WITH
DEFENDANTS' PARTIAL
OPPOSITION TO MOTION TO
INTERVENE AND JOIN
PARTIES**

I, MARSHALL R. KING, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice in this Court and a partner in the law firm of Gibson, Dunn & Crutcher LLP, co-counsel to Defendants Tyco International Group S.A. (“TIGSA”) and Tyco International Ltd. (“Tyco”). I submit this declaration in connection with Defendants’ partial opposition to Plaintiffs’ motion to intervene and join parties.
2. Attached hereto as Exhibit A is a true and correct copy of the indenture dated as of June 9, 1998, pursuant to which defendant TIGSA issued certain publicly traded notes.
3. Attached hereto as Exhibit B is a true and correct copy of the indenture dated as of November 12, 2003, pursuant to which defendant TIGSA issued certain publicly traded notes.

I declare under penalty of perjury that the foregoing is true and correct. Executed this
13th day of July, 2007 at New York, New York.



Marshall R. King